

BIO-RAD**Bio-Rad
Laboratories**

Corporate Offices
1000 Alfred Nobel Drive
Hercules, California 94547
Telephone: (510) 724-7000
Facsimile: (510) 741-5815

Anthony B. Fong
Assistant General Counsel
Direct: (510) 741-6079
E-Mail: anthony_fong@bio-rad.com

ORIGINAL

September 17, 2002

VIA AIRBORNE EXPRESS

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

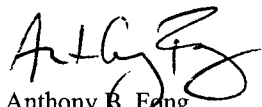
Re: Sadtler Research Laboratories, Inc. Required Submission of Information

Dear Ms. Prisk:

Enclosed please find Bio-Rad Laboratories, Inc.'s Answers to Questions contained in Enclosure F of the Required Submission of Information relating to the Lower Darby Creek Area Superfund Site.

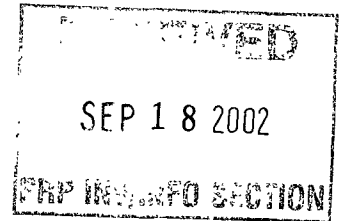
Please contact me if you have any questions or require any additional information.

Very truly yours,



Anthony B. Fong
Assistant General Counsel

cc: Jane McGowan



ORIGINAL

United States Environmental Protection Agency
Required Submission of Information
Lower Darby Creek Area Superfund Site
Clearview Landfill, Folcroft Landfill and Folcroft Landfill Annex
Enclosure F, Answers to Questions

CONFIDENTIAL/PROPRIETARY INFORMATION

1. Bio-Rad Laboratories, Inc. ("Bio-Rad"),
Informatics Division
3316 Spring Garden Street
Philadelphia, PA 19104
Telephone: 215 382 7800

The corporate headquarters for Bio-Rad is located at 1000 Alfred Nobel Drive, Hercules, CA 94547 (Telephone: 510 741 7000)

- a. Bio-Rad was incorporated in California in 1957. In 1975, its state of incorporation was changed to Delaware.
- b. Bio-Rad has numerous direct and indirect subsidiaries located in the United States and abroad. Information concerning these subsidiaries is contained in the company's form 10-K on file with the US Securities and Exchange Commission.

2. Bio-Rad's Informatics Division is a software and database company. It specializes in the design and production of software and database solutions for the analytical informatics industry. The Division is a producer and distributor of spectral databases, with a collection that contains IR, NMR, UV/Vis, GC, MS, Raman, and Near IR data.

Bio-Rad acquired Sadtler Research Laboratories, Inc. in 1978. During the period from 1958 until 1976, Sadtler Research Laboratories, Inc. was a scientific publisher of IR, NMR, UV/Vis, GC, MS, Raman, and Near IR data in hard copy (book) form, as well as a chemical consulting company. During that time period, Sadtler operated a print shop, a spectral lab and a chemical consulting lab. The spectral lab was used to generate spectral data of various chemicals. The chemical consulting lab was used to analyze material samples for customers. Over time, the business changed from hard copy publishing to digital databases and software for use with personal computers. After 1947, chemical consulting constituted a small part of the overall operations (no more than 20%), which diminished over time until it ceased operations in the mid-1980s. Sadtler kept small amounts of thousands of chemicals on site to generate spectral data. These chemicals were retained by the Company until approximately 1999 at which time they were disposed of by Clean Harbors Environmental. Saved chemicals were often reused to generate new spectral data as new analytical techniques evolved over time. Sadtler also retained materials sent by customers for analysis until approximately 1999, at which time such materials were also disposed of by Clean Harbors.

3. Marie Scandone
Bio-Rad Laboratories, Inc.
Informatics Division
3316 Spring Garden Street
Philadelphia, PA, 19104
Telephone: 215 382 7800


ORIGINAL

US EPA

Page 2 of 7

CONFIDENTIAL/PROPRIETARY INFORMATION

- 1971 - present (Current title) Product Manager for the Database Products.

Bernadette Steiner
Bio-Rad Laboratories, Inc.
Informatics Division
3316 Spring Garden Street
Philadelphia, PA, 19104
Telephone: 215 382 7800

- 1960 – present, (Current title) Purchasing

Wayne Liss
Bio-Rad Laboratories, Inc.
Informatics Division
3316 Spring Garden Street
Philadelphia, PA, 19104
Telephone: 215 382 7800

- 1962 – present (with intermittent periods where he did not work at Bio-Rad), (Current title) Northeast and Academic Account Sales Representative

James Wright
Retired Bio-Rad employee

- 1967 – 2001 as Manufacturing Associate 2

Last known address:
404 North 53 Street
Philadelphia, PA 19139

William Simons
Retired Bio-Rad employee

- Scientist, 1962 – 1998

Last known address and telephone number:
155 Newbolds Corner Road,
Southampton, NJ 08088-8807
(609) 859-9483

Traude Sadtler
Former Sadtler Employee and owner

- Spectra Lab manager under Sadtler and Block Engineering ownership. She left sometime around 1975.

Last known address and telephone number:
3555 West School House Lane
Philadelphia PA 19144-5421
215 849-8100 (work)

Richard Ennis
Former Sadtler Employee:

- Controller during 1970's and 1980s. (Last date of employment unknown)

Last known address and telephone number:
575 Revere Road


ORIGINAL

US EPA
Page 3 of 7
CONFIDENTIAL/PROPRIETARY INFORMATION

Merion Station PA 19066
610 664 8960

Don Slavin
Former Sadtler Employee
• Spectra Lab Manager in 1960s
Last known employment address and telephone number:
Philadelphia Community College
1700 Spring Garden Street
Philadelphia PA 19130
215 751 8619

4. Owners and operators of the establishment in the Philadelphia, Pennsylvania area from 1958 to present are as follows:

1958 - 1968	Sadtler Research Laboratories, Inc.
1969 - 1977	Sadtler Research Laboratories, Inc. was acquired by Block Engineering Inc. of Massachusetts in 1969.
1978 - 2000	Block Engineering was acquired by Bio-Rad in 1978 and Sadtler Research Laboratories, Inc. became Bio-Rad's Sadtler Division.
2001	Name changed to Informatics Division of Bio-Rad Laboratories, Inc.

a and b Dates of operation/Nature of operation:

1958 - Sadtler Research Laboratories, Inc.

- Scientific publishing company, selling hard copy (paper books) spectra of IR, NMR, UV/Vis, GC, MS, Raman, and Near IR data, as well as a chemical consulting company.

1969 - Sadtler Research Laboratories, Inc. acquired by Block Engineering

- Scientific publishing company, selling hard copy (paper books) spectra of IR, NMR, UV/Vis, GC, MS, Raman, and Near IR data, as well as a chemical consulting company.

1978 - Sadtler Research Laboratories, Inc. acquired by Bio-Rad.

- Scientific publishing company, selling hard copy (paper books) and later digital data and software forms of spectra of IR, NMR, UV/Vis, GC, MS, Raman, and Near IR data, as well as a chemical consulting company.
- Consulting chemists until approximately 1985.

- c. Sadtler Research Laboratories, Inc. contracted with Tri-County Hauling in 1974 to haul the office trash, as per PO 6472, received from EPA as part of these questions. Bio-Rad recalls using chemicals for developing photographs and ink for its printing operations. It also recalls using solvents in the labs (such as acetone and chloroform) but does not believe that these materials were disposed of in the office trash. Many of these solvents were recycled for reuse. Bio-Rad recalls that cans and bottles were rinsed before being

ORIGINAL

thrown away in the trash. The silver from photo processing was recovered. Bio-Rad has been unable to locate any documents responsive to this request and believes that any relevant documents for the period prior to 1980 were destroyed during a flood its off-site warehouse in the mid-1980s.

5. Bio-Rad believes that Sadtler would have maintained purchase orders and invoices for its contract with Tri-County Hauling, or other trash collecting company, for the period from 1958 until 1976. In addition, Sadtler maintained lab data sheets for all pure organic compounds to record and identify samples used in the labs. These lab data sheets still exist for the years 1967 through 1996 and can be made available to the EPA upon request. Other than lab data sheets, Bio-Rad has been unable to locate any other documents responsive to this request and believes that any such documents for the period prior to 1980 were destroyed during a flood its off-site warehouse in the mid-1980s.

- a. Each lab data sheet contains the following information:
 - name, including all synonyms
 - molecular formula
 - molecular weight
 - melting point, if available
 - boiling point, if available
 - source of sample
 - chemical structure
 - Sadtler Lab Number
 - Date sample run
 - Operator initials
- b. Bio-Rad has been unable to locate any information or documents responsive to this request and believes that any relevant documents were destroyed during a flood of the its off-site warehouse in the mid-1980s.
- c. Sadtler Research Laboratories, Inc. contracted with Tri-County Hauling in 1974 to haul the office trash. Bio-Rad has been unable to locate any other information or documents responsive to this request and believes that any relevant documents were destroyed during a flood of its off-site warehouse in the mid-1980s.

6. Sadtler handled thousands of chemicals at its establishment in Philadelphia between 1958 and 1976. Bio-Rad cannot respond to this request because the request is too burdensome.

- a. See answers to questions 2 and 4c above.
- b. Bio-Rad cannot respond to this request because the request is too burdensome.
- c. The chemicals used in the spectral lab for developing spectral data were stored in vials in relatively small quantities of between 1/2 to 10 grams per sample. Solvents were purchased in five-gallon cans and one gallon bottles. No more than 25 gallons of solvent were stored on site at any one time.
- d. Sadtler used, purchased and stored chemicals at its establishment in Philadelphia during the entire period from 1958 through 1976.
- e. See answer to question 6.c above.


ORIGINAL

- f. Bio-Rad cannot respond to this request because the request is too burdensome and because it does not have access to relevant documents that would identify these person or companies.
- 7. Sadtler's operations would have generated the following by-products and waste: paper, used solvent bottles and cans, card board, soda cans, bottles and other garbage from its day to day operations.
 - a. Trash was picked up from each office by a cleaning person and transported to trash barrels in the shipping area for collection by Tri-County Hauling.
 - b. Solids, such as glass, paper, cardboard, bottles and cans
 - c. Bio-Rad cannot identify the annual quantity.
 - d. Trash was collected in a trash barrels in the shipping area.

Trash was collected by Tri-County Hauling. Sadtler may have contracted with other trash haulers during the relevant period; however, Bio-Rad does not have access to documents that would identify the names of other trash haulers.
 - e. Trash was collected by Tri-County Hauling. Bio-Rad has no knowledge of where the trash was taken by Tri-County Hauling.
- 8. Sadtler Research Laboratories, Inc. contracted with Tri-County Hauling in 1974 to haul the office trash.

To Bio-Rad's knowledge, Sadtler Research Laboratories, Inc. did not contract for waste disposal with any of the other entities listed in question 8 during the period from 1958 to 1976; however, Bio-Rad does not have access to documents that would identify the names of other trash haulers Sadtler may have contracted with.
- 9.
 - a. Bio-Rad has no information responsive to this request.
 - b. Bio-Rad believes that trash was removed and transported for disposal by Tri-County Hauling and perhaps other trash haulers during the entire period from 1958 to 1976.
 - c. To Bio-Rad's knowledge, the material disposed of consisted of papers, cardboard boxes, bottles, and other garbage.
 - d. Bio-Rad is unable to estimate the annual quantity. Bio-Rad believes that Tri-County Hauling picked up trash from Sadtler's Philadelphia establishment once or twice per week.
 - e. Trash was collected by Tri-County Hauling from barrels in the shipping area.


ORIGINAL

- f. Trash was picked up from each office by a cleaning person and transported to trash barrels in the shipping area. Bio-Rad has no knowledge of where the trash was taken by Tri-County Hauling.
 - g. Bio-Rad has no information responsive to this request.
 - h. Bio-Rad has no information responsive to this request.
 - i. Bio-Rad has no information or documents responsive to this request. Bio-Rad believes that any relevant documents were destroyed during a flood of its off-site warehouse of in the mid-1980s.
- 10.
- a. Bio-Rad has no information responsive to this request.
 - b. Bio-Rad has no information responsive to this request.
 - c. Bio-Rad has no information responsive to this request.
- 11.
- a. Bio-Rad has no information responsive to this request.
 - b. Bio-Rad has no information responsive to this request.
 - c. Bio-Rad has no information responsive to this request.
 - d. Bio-Rad has no information responsive to this request.
 - e. Bio-Rad has no information or documents responsive to this request.
12. To Bio-Rad's knowledge, the answer to question 12 is no.
13. Bio-Rad did not own Sadtler Research Laboratories, Inc. during the period from 1958 to 1976 and did not have any employees involved in waste removal at Sadtler's Philadelphia establishment during that time period. Bio-Rad does not know the identities of the person at Sadtler Research Laboratories, Inc. who were responsible for removing and disposing of waste during that time period. During part of that time period, Richard Ennis was the Controller of the company and was responsible for payment approvals; Don Slavin was head of spectra laboratory in 1960s. Traude Sadtler was head of spectra laboratory in later years.
14. No.
15. Bio-Rad believes that Tri-County Hauling picked up trash from Presbyterian Hospital (located at 39th and Market Streets, Philadelphia, PA) prior to pick up from Sadtler.
- 16.
- a. Jane McGowan

ORIGINAL

Manager, Distributor Support
Bio-Rad Laboratories, Inc.
Informatics Division
3316 Spring Garden Street
Philadelphia PA 19104
215 382 7800

Marie Scandone
Product Manager for Databases
Bio-Rad Laboratories, Inc.
Informatics Division
3316 Spring Garden Street
Philadelphia PA 19104
215 382 7800

- b. Anthony Fong
Assistant General Counsel
Bio-Rad Laboratories, Inc.
1000 Alfred Nobel Drive
Hercules, CA 94574
510 741 6079

17. Bio-Rad has been unable to locate documents responsive to this information request and believes that any relevant documents for the period prior to 1980 were destroyed during a flood of its off-site warehouse in the mid-1980s.

- a. Bio-Rad's Informatics Division retains accounting records for 10 years.
- b. See answer to question 17 above.
- c. Old invoices and purchase orders from Tri-County Hauling.
- d. Sadtler and later Bio-Rad rented the off-site warehouse space where its documents were archived.

To the knowledge of Bio-Rad, the foregoing answers to questions are true and correct.

Bio-Rad Laboratories, Inc.

By: 

Sanford S. Wadler

Vice President and General Counsel